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7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 MARK HAN,  
15 Defendant.

Case No. 2:14-cr-278-JAD-VCF

**AMENDED UNOPPOSED MOTION  
TO CONTINUE SELF  
SURRENDER DATE  
(2<sup>ND</sup> REQUEST)**

16 Comes now the defendant, Mark Han, by and through his counsel of record, Raquel  
17 Lazo, Assistant Federal Public Defender, and hereby moves this court for an order to continue  
18 his self-surrender date for sixty (60) days. This request is based on the Points and Authorities  
19 attached hereto.  
20

21 DATED this 2<sup>nd</sup> of February, 2016

22  
23 RENE L. VALLADARES  
Federal Public Defender

24 By: /s/Raquel Lazo

25 RAQUEL LAZO  
Assistant Federal Public Defender  
26 Attorney for Mark Han

**POINTS AND AUTHORITIES**

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2  
3 1. Mr. Han is required to voluntarily surrender on February 23, 2015. *See* Minutes  
4 (#42).  
5

6 2. Mr. Han previously requested a continuance of his self-surrender date to permit  
7 him to finish a project with his employer, Joshua Gust. There were a few delays with the  
8 project. Mr. Han's employer has now secured the contract with the client and desires Mr. Han's  
9 assistance to finalize the terms of the contract. The opportunity to finish this project will also  
10 permit Mr. Han the ability to earn some extra money to be saved and used for when he is  
11 released from custody. It is anticipated that this is a contract and client that Mr. Han will  
12 continue to work on from within custody (on a limited basis) and after he is released from his  
13 term of incarceration.  
14

15 3. Mr. Han's Pretrial Services Officer, Kamu Kapanui, has no opposition. Mr.  
16 Han is in full compliance.  
17

18 4. The government also has no opposition.  
19

Respectfully submitted,

20 By: /s/Raquel Lazo

21 RAQUEL LAZO  
22 Assistant Federal Public Defender  
23 Attorney for Mark Han  
24  
25  
26

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK HAN,

Defendant.

Case No. 2:14-cr-278-JAD-VCF

**PROPOSED ORDER**

IT IS HEREBY ORDERED that Defendant Mark Han, have his self-surrender day continued to April 23, 2016.

DATED this 3rd day of February, 2016.



UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on January 21, 2016, he served an electronic copy of the above and foregoing Unopposed Motion to Continue Self Surrender Date by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
Amber Craig  
Assistant United States Attorney  
333 Las Vegas Blvd. So. 5th Floor  
Las Vegas, NV 89101

/s/ Brandon Thomas  
Employee of the Federal Public Defender